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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AUDLEY BARRINGTON LYON, JR., et. al.,

Plaintiffs,

v.

UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT, et. al.,

Defendants.

Case No. 13-cv-05878 EMC

**JOINT STIPULATION REGARDING
SCHEDULE FOR FILING OF
SETTLEMENT AGREEMENT AND
MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT
AGREEMENT; [~~PROPOSED~~] ORDER**

1 The parties respectfully submit this joint stipulation and proposed order concerning the
2 schedule for submitting their settlement agreement for preliminary approval.

3 Trial in this case was scheduled for May 23, 2016. On May 16, 2016, the parties reached
4 an agreement in principle to settle the case, and the Court vacated the trial date. *See* ECF No. 256.
5 The Parties have been diligently working to finalize their Settlement Agreement, which includes
6 as Exhibits a proposed Final Order and proposed Preliminary and Final Notices to the Class.
7 Plaintiffs also plan to file an unopposed Motion for Preliminary Approval of the Settlement
8 Agreement.

9 In order to finalize the language and details of the Settlement Agreement and Exhibits,
10 obtain approval from Plaintiff Class Representatives and Defendants' representatives, and provide
11 the Court with thorough briefing for the preliminary approval motion, the Parties propose the
12 following schedule:

- 13 • June 13, 2016: Plaintiffs file unopposed motion for preliminary approval of settlement
14 agreement along with executed settlement agreement.
- 15 • June 30, 2016: Hearing on Plaintiffs' motion for preliminary approval of settlement
16 agreement.

1 Dated: June 1, 2016

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3 By: /s/ Robert P. Varian
ROBERT P. VARIAN (SBN 107459)

4 Dated: June 1, 2016

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28 *Attorneys for Plaintiffs*

1 Dated: June 1, 2016

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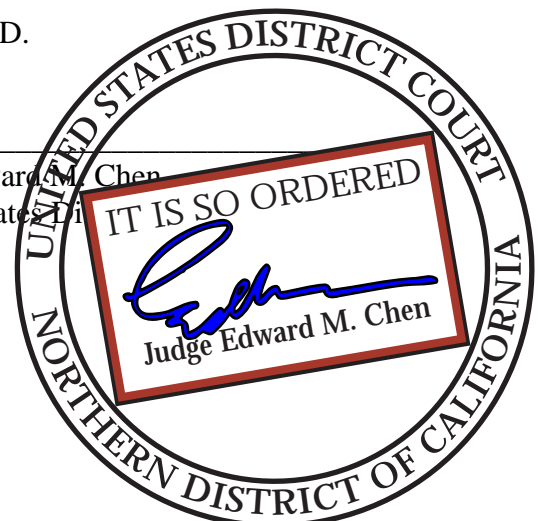
Attorneys for Defendants

20 **[~~PROPOSED~~] ORDER**

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 Date: 6/3/16

23 Hon. Edward M. Chen
24 United States District Judge



ATTESTATION OF CONCURRENCE IN JOINT FILING
Pursuant to Local Rule 5-1 (i)(3)

I, Julia Harumi Mass, hereby attest that the other signatories listed here have concurred in the filing of this document.

Dated: June 1, 2016 By: /s/ Julia Harumi Mass
JULIA HARUMI MASS (SBN 189649)

CERTIFICATE OF SERVICE
No: 3:13-cv-05878 EMC

I hereby certify that on June 1, 2016, a true and correct copy of the foregoing Joint Stipulation Regarding Schedule for Filing Settlement Agreement and Motion for Preliminary Approval was served with the Clerk of the Court by using the CM/ECF system, which provided an electronic notice and electronic link of the same to all attorney of record through the Court's CM'ECF system.

Dated: June 1, 2016 By: /s/ Julia Harumi Mass
JULIA HARUMI MASS (SBN 189649)